

	)	
JIN MING LIN, CHI WAI CHAO,	)	
YOOK THAI CHEAH, MING F. FUNG,	)	
MUOI GIANG, YUEN YUE SOOHOO,	)	
and MEI ZHI,	)	
	)	
Plaintiffs,	)	Civil Action No. 09-11510-GAO
v.	)	
	)	
CHINATOWN RESTAURANT CORP.,	)	
and JOYCE P.Y. HAYES,	)	
	)	
Defendants.	)	
	)	

Plaintiffs move this Honorable Court to preclude Defendants from attempting to introduce any documents that have not been produced in discovery.

Defendants should be precluded from attempting to introduce any documents that were not produced in discovery. Further, the Defendants should be precluded from arguing that the plaintiffs cannot prove certain damages due to this gap in pay documents.

RESPECTFULLY SUBMITTED,

**For Plaintiffs**

By their attorneys,

/s/ Myong J. Joun

Myong J. Joun

BBO No. 645099

Joun Law Office

491 Massachusetts Ave., Suite 208

Arlington, Massachusetts 02474

Tel.: (617) 304-6186

Fax: (866) 551-4983

Email: [mjoun@massrights.com](mailto:mjoun@massrights.com)

/s/ Jeffrey Wiesner

Jeffrey Wiesner

BBO No. 655814

Stern, Shapiro, Weissberg & Garin, LLP

90 Canal Street, Suite 500

Boston, MA 02114-2022

Tel.: (617) 742-5800

Fax: (617) 742-5858

Email: [jwiesner@sswg.com](mailto:jwiesner@sswg.com)

Dated: October 19, 2012

**CERTIFICATE OF SERVICE**

I certify that on this day I caused a true copy of the above document to be served upon the attorney of record for all parties via CM/ECF.

Date: 10/19/2012 /s/Myong J. Joun  
Myong J. Joun